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November 14, 1998

Federal Communications Commission  
1919 M Street N.W.  
Washington, D. C. 20554

Subject: WT Docket 98-143....comments.

Ladies and Gentlemen:

Introduction:

Thanks for your work on this "streamlining" proposal. My comments are those of a concerned old ham who has enjoyed a wonderful life (so far) and has formed rather firm opinions about discipline, values, the work ethic, and the granting of privileges commensurate with the effort expended to earn those privileges....(just ask my five adult offspring!).

I am concerned that the ARRL (to which I have been a member for many years) seems to have a growth objective which would sacrifice quality for quantity. Much of their original proposal (e.g. "open book" exams to gain entry to certain HF phone bands for current Novices to demonstrate "minimal" understanding, "at their own convenience" and without the "pressure of a supervised examination".....good heavens, aren't those rather puerile straight memorization multiple choice exam texts easy enough?....Tech Plus licensees given automatic upgrades to the "Intermediate" license with HF phone privileges.....code dropped to ten words per minute because a "learning plateau" before thirteen wpm presents a "significant barrier" to upgrading) leads me to that conclusion. Although subsequently modified, that original ARRL proposal (March 1997 QST) made discernible to some of us the league's real objective.....quantity over quality ..... It was most disappointing.

Comments:

1. Current Novice and Technician licensees should be given a window, perhaps one year, to upgrade to your proposed "Technician" license. If current Novices and Techs do not have the drive or the discipline to upgrade, revoke the licenses. I strongly oppose easing of requirements for those who have not exhibited the interest, the drive or the discipline to move up. Retain the five wpm code requirement and, please, don't grant HF phone privileges beyond what are currently enjoyed by Tech Plus licensees.

I also see no point in granting five wpm credit to expired novice or technician licenses who reapply. You really should require that they go through the full new process to acquire the new "Technician" license.

2. Retain the 13 wpm for the General Class and the 20 wpm for Extra. Why? Because Amateur Radio is not the personal radio service. Nor is it CB aligned. Nor is it a radio frequency version of the Internet. We are who we are because we can communicate under the most demanding conditions and enthusiastically offer those capabilities in times of extreme need when others are rendered mute. By flashing lights, by auto horn across a canyon, by tapping on a prison wall (only the Viet Nam type, of course), by touching a couple of bare wires together we get the message through.

3. No, I would not be willing to trade a reduction in Morse Code requirements for additional written elements on newer digital technologies. Add the new questions on digital but do so in a meaningful manner....not via those exact question and answer examples as used in the current ARRL sponsored exam study books.

4.. One full minute of solid copy out of the five minute test should be the minimum requirement for a demonstration of CW proficiency. Fill-in-the-blanks or writing of the actual dots and dashes for a leisurely translation later on must not be allowed. The ridiculous extent to which the League and the VEC processes have

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gone to make things easier makes me almost unwilling to belong anymore to this "club that will have me" (thanks, Grouch Marx).

5.. Under the proposed new structure I agree that Technicians (having passed the five wpm requirement) should be able to operate anywhere within the CW portions of the band granted to those holding General Class licenses....and at the 200 watt restriction. The reserved CW areas for the Advanced and Extra licensees should remain reserved, however. Removal of the designation of certain frequencies for novice use will free those frequencies for consideration for a possible expansion of the phone bands in the future.

6. If changes to the written tests are contemplated I strongly suggest that they not be in the silly, anyone-can-do-it , straight memorization modes promoted by the ARRL in its exam study books. Understanding and memorization do not necessarily correlate. The overall quality of the licensee has gone down over the years. You folks must know that better than I. Please bring back circuit diagramming and identification and questions tangential to the teaching text and not directly copied or easily memorized. The toughest ham radio test I ever took was for the General Class and was held at the Federal Building in New York City before two crusty old fellows who really seemed to jealously withhold the privilege unless persuaded that the quaking applicant before them really knew his oats. I want Amateur Radio to be a distinct service with members who take pride in licenses earned through the enforcement of more rigorous requirements.

Conclusion:

No one values an unearned privilege. Unearned privileges invite abuse. You FCC folks should, above all, be aware of that. To relax already undemanding requirements (as the ARRL had proposed) might build membership but at a terrible price. Please do what you can to toughen up, or at least retain, those written and CW requirements that set the Amateur Radio community apart. To acquiesce to those who would take the easy way in pursuit of membership growth would find you, in a few short years, overwhelmed by enforcement activities. Our distinctive characteristics as Radio Amateurs must be preserved and strengthened, even if our ranks are thinned, if we are to survive in this coming decade of wrist radio, worldwide cell phone, and Internet communications capabilities.

Thanks for your time.

Sincerely,

  
Norman E. Woodward WR1W

Addendum:

I have just this hour received the new final ARRL License Restructuring proposal in the December issue of QST and find that it confirms, in spades, the fears I expressed in these comments. It is an obvious dumbing down of requirements and does indeed give away privileges to current Novices and Technician Plus licensees who hitherto had not the drive and discipline to upgrade.

At the end of the ruinous ARRL proposal is a statement that they intend to ask the FCC for an improvement in its enforcement processes!!! How absurd! On the one hand they open the gates to allow the unqualifieds to populate our frequencies and then have the blind-eyed nerve to ask you folks to improve your enforcement processes! Please, please reject the ARRL proposal. Should it be accepted you will have little time for other than enforcement actions!

How shortsightedly foolish and actively disingenuous those people have been. They vociferously deny a "dumbing down" intent and then produce a final recommendation to the FCC that does exactly that!

The ARRL plan may add numbers to the League membership rolls but will, in the rather short run, contribute to the increase of the incivilities and poor operating habits so distressingly evident even today.

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